

AFFIDAVIT

I, Steven Lester, being first duly sworn, hereby depose and state as follows:

1. I am employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) and have been so employed for approximately 16 years. Prior to my employment with ATF, I was a Police Officer and Investigator with the Kansas City, Missouri ~~Kanas~~ **Kansas** Department for approximately six and one-half years. I am a graduate of the ~~Kanas~~ City Regional Law Enforcement Academy, the Federal Law Enforcement Training Center Criminal Investigator Training Program and the Bureau of Alcohol, Tobacco, Firearms and Explosives' National Academy. My duties as a Special Agent consist of investigating criminal violations of federal alcohol, tobacco, firearm, arson, and explosives laws.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agent witnesses, and my review of records, documents and other physical evidence obtained during the investigation. This Affidavit is intended to show probable cause that **Fedo Antonia MANNING** (hereafter **F. MANNING**) has committed numerous federal offenses, to include the following violations: Title 18, United States Code, Sections 922(a)(6) (false statements intended or likely to deceive a firearms dealer), 924(a)(1)(A); (false statements during purchases of a firearms), Title 18, United States Code, Section 933(a)(1), (3), and (b) (trafficking conspiracy to traffic firearms); and Title 18, United States Code, Sections 922(a)(1)(A), 923(a) and 924(a)(1)(D) (engaging in firearm sales without a license). This Affidavit does not set forth all of my knowledge about this investigation, but rather only facts sufficient to establish probable cause that **F. MANNING** has committed the aforementioned offenses that are also identified in the Complaint.

3. On April 16, 2022, an ATF Confidential Informant (CI#1¹) was working an event located at 7148 South Prospect, Kansas City, Missouri, and observed approximately 40 patrons with firearms. CI#1 contacted Damon MONDAINE who told CI#1 he could get firearms on a regular basis. This led to the multiple controlled firearms purchases. CI#1 purchased a total of 27 firearms from Antonio MANNING (hereinafter A. MANNING), Dejahuan HUNTLEY (hereinafter HUNTELY), Sheron MANNING (hereinafter S. MANNING), Michael HARDY (hereinafter HARDY), Demon MONDAINE, and Ezekiel DILLARD. On May 17, 2023, in the Western District of Missouri (Case Number 4:23-cr-00111-BP), A. MANNING, HUNTELY, S. MANNING, and HARDY were indicted for Conspiracy to Traffic Firearms, Engaging in Firearm Sales Without a License, Trafficking Firearms, Possession of an Unregistered Machinegun, and HUNTLEY was additionally indicted for two counts of being a Felon in Possession of a Firearm. On February 21, 2024, HUNTLEY pled guilty to three federal offenses for conspiracy to traffic firearms, possession of an unregistered machinegun and for knowingly being a felon in possession of a firearm. Counts One and Two of that indicted case mirror Counts One and Two of the Complaint with the addition of **F. MANNING** as a defendant.

4. Between approximately May 24, 2022, and April 20, 2023, A. MANNING, HUNTLEY, S. MANNING, and HARDY confederated and agreed with each other to transfer the

¹ CI#1 has previously been arrested six times, with the most recent arrest in 2008. CI#1 is cooperating with law enforcement for monetary compensation. ~~The information~~ CI#1 has been cooperating with law enforcement for approximately 17 years. The information CI#1 has provided, in this investigation and in previous investigations, has proven to be accurate and truthful. The information provided has been corroborated by multiple investigative techniques. CI#1's information concerning this firearm trafficking organization has been corroborated by information obtained from public databases, physical surveillance, and controlled firearm purchases. I therefore believe CI#1 is credible and the information provided by CI#1 is reliable.

below list of firearms to CI#1, who was prohibited from legally possessing firearms as he was previously convicted of an offense punishable by a term of imprisonment in excess of one year.

- A Glock, Model 19, 9mm caliber, handgun, bearing Serial Number BKHR170;
- A Glock, Model 17, 9mm caliber, handgun, bearing Serial Number AARD738;
- A Glock, Model 23, .40 caliber, handgun, bearing Serial Number BUGF363;
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22022202;
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22022226;
- A Romar/Cugir, Mini Draco, 7.62 x 39 caliber, pistol, bearing Serial Number ROA 22 PG-3659;
- A Century Arms, Model "VSKA," 7.62 x 39 caliber, pistol, bearing Serial Number SV7P008760;
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22022225;
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22022215;
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22021785;
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 21412257;
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22094913;
- A Glock, Model 22, Model 22, .40 caliber, pistol, bearing Serial Number XCD938;
- A Glock, Model 19, 9mm caliber, pistol, bearing Serial Number BHCR180;
- A Glock, Model 41, .45 caliber, pistol, bearing Serial Number YWE140;

- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing an obliterated Serial Number;
-
- An Anderson Manufacturing, Model AM-15, AR-15 style, multi-caliber, pistol, bearing Serial Number 22108192;
- A Glock, Model 22, .40 caliber, pistol, bearing Serial Number BWTM124;
- A Glock, Model 23, .40 caliber, pistol, bearing Serial Number ZLZ965;
- A Glock, Model 19, 9mm caliber, pistol, bearing Serial Number BKPX144;
- A Glock, Model 17, 9mm caliber, pistol, bearing Serial Number BKUB535; and
- A Glock, Model 22, .40 caliber, pistol, bearing Serial Number MYR680.

5. Between approximately May 24, 2022, and April 20, 2023, CI#1 purchased the above identified firearms during several controlled purchases. Throughout the course of these controlled purchases of firearms, CI#1 informed A. MANNING, S. MANNING, and HUNTLEY that CI#1 was a convicted felon. Additionally, through the course of this conspiracy, A. MANNING, S. MANNING, HARDY, and HUNTLEY all sold unregistered machine guns to CI#1. It is a felony for any person to possess an unregistered machine gun.

6. ATF investigators received the tracing data for all the firearms purchased in the aforementioned indictment and learned that two of the twenty-two firearms were purchased by **F. MANNING**. Throughout the course of the investigation, law enforcement officials purchased a total of twenty-seven firearms and based on the tracing information **F. MANNING** purchased seven of those firearms (the firearms identified in Counts Four, Five, Six, Seven, Eight, Nine and Twelve of the Complaint.) ATF agents set up an alert for when **F. MANNING's** information was run by a Federal Firearms Licensee ("FFL") for the purpose of conducting a firearms background check, also known as a National Instant Criminal Background Check System (hereinafter NICS check). The alerts ran from approximately May 11, 2022, until it expired and was not renewed on

or about January 13, 2023. During this time period, **F. MANNING** purchased forty firearms. Thirty-three of those firearms, or approximately 83% of them, were Anderson Manufacturing, Model AM-15, firearms, all of which were purchased as lower receivers. **F. MANNING** also attempted to purchase two more lower receivers that are referred to in this affidavit as **Firearms #17** and **#18**. By federal definition, a receiver is a firearm and is the only controlled component of a firearm. Based on my training and experience, I know that private citizens who are firearms collectors do not typically purchase the same make and model firearm with no variation for personal use, but rather doing so is indicative of firearms trafficking. Based on my training, experience, and knowledge of this investigation, I believe **F. MANNING** is either selling the only controlled component of a firearm or building the firearms and trafficking them as complete firearms. It is also my belief that **F. MANNING** is related to both A. MANNING and S. MANNING. Both A. MANNING and S. MANNING sold firearms CS#1 on multiple occasions and CS#1 had informed both of them that CS#1 had been convicted of a felony. I also know that CS#1 ordered firearms from A. MANNING and S. MANNING and that **F. MANNING** purchased some of these firearms in close proximity to when some of these firearms' transactions occurred. Accordingly, based on my training, experience and knowledge of this investigation, I believe **F. MANNING** was serving as a straw purchaser to purchase firearms for CS#1 who he knew was prohibited from purchasing firearms as CS#1 was an admitted felon.

7. ATF investigators learned, in addition to the seven firearms purchased by **F. MANNING** and recovered during the investigation of the above referenced firearm trafficking case (Case No. 4:23-cr-00111-BP), an additional seven firearms that were purchased by **F. MANNING** were also recovered during investigations of crimes in the Kansas City metropolitan area. One of those recovered firearms was discovered after the recent shooting that

occurred on February 14, 2024, at the celebration of the Kansas City Chiefs Super Bowl victory that occurred at the historical Union Station in Kansas City, Missouri (hereinafter Chiefs' Rally). The details for each recovered firearm are as follows:

FIREARM #1 RECOVERY

8. On February 14, 2024, during the Chiefs' Rally, several individuals got into an argument and began shooting. One person was killed, and 22 others were injured by gunfire. Witnesses showed officers where they saw suspects discard several firearms, and where one of the shooting suspects was detained. An Anderson Manufacturing, Model AM-15, .223 caliber pistol, bearing serial number 22022228 (hereinafter **Firearm #1**) was found along the wall with a backpack next to two other AR-15 style firearms with backpacks. **Firearm #1** had one live round in the chamber, 26 live rounds in the magazine, and was in the "fire" position. The magazine is capable of holding 30 live .223 caliber rounds of ammunition.

9. One of the firearms located next to **Firearm #1** ballistically matched to casings recovered from the scene. Only 22 spent shell casings were recovered after the incident, none of them were .223 caliber casings. Based on the case evidence, I believe 12 individuals brandished firearms during the incident and at least six of them fired their weapons. Based on my training and experience, I believe many of the spent shell casings were not recovered due to the chaos of the scene as they could have been kicked, stuck in shoes, stuck in ambulance tires, etc. Based on the recovery location of **Firearm #1**, I believe it was brandished during the incident and could have fired three or four rounds before it was discarded.

FIREARM #1 PURCHASE

10. After receiving trace report (T20240088355) for **Firearm #1**, I reviewed it and learned **F. MANNING** purchased it on August 7, 2022, from Frontier Justice, located at 800 NE

Jones Industrial Drive, Lee's Summit, Missouri 64064. The time that elapsed from when **Firearm #1** was purchased by **F. MANNING** to when it was found at the Chiefs' Rally was 556 days. Based on the recovery of **Firearm #1**, which was one of the known 33 Anderson Manufacturing, Model AM-15 firearms purchased by **F. MANNING**, at the scene of a mass shooting, and my training and experience, I believe **Firearm #1** was trafficked on the illegal market.

11. On February 21, 2024, ATF investigators requested Firearms Transaction Records 4473 forms from multiple FFLs in the Kansas City area for purchases made by **F. MANNING**. Frontier Justice provided the 4473 Form for **Firearm #1**. The 4473 Form shows **F. MANNING** purchased the **Firearm #1** receiver and another Anderson Manufacturing, Model AM-15, bearing serial number 22022235 receiver (hereinafter **Firearm #4**, further details below under **Firearm #4**) on August 7, 2022. **F. MANNING** used his Missouri Driver's License (DL #D203080015) to facilitate the transaction, which prompted a NICS check. The NICS check was conducted and generated a transaction number 102KRMDV3 resulting in a response of "Proceed." I also reviewed the answer to Question 21a. on the 4473, which asked, "Are you the actual transferee/buyer of the firearm(s) listed on this form and any continuation sheet(s)."² The answer to the question was a check mark in the "Yes" column. **F. MANNING** listed his address as 4207 Windsor Avenue, Kansas City, Missouri 64123. During the course of this investigation, law enforcement officials have surveilled this address and observed **F. MANNING** at the address. Accordingly, I believe that **F. MANNING** did in fact conduct this firearm transaction.

²Paragraph 21a on the 4473 form has the following warning in bold: "Warning: You are not the actual transferee/buyer if you are acquiring any of the firearm(s) on behalf of another person. If you are not the actual transferee/buyer, the licensee cannot transfer any of the firearm(s) to you." This warning is on every 4473 referenced in this Affidavit.

12. A check of **F. MANNING**'s criminal history showed **F. MANNING** pled guilty to Peace Disturbance in Higginsville, Missouri, and was sentenced to a \$500 fine. Based on my review of **F. MANNING**'s criminal history, I do not believe that **F. MANNING** has previously been convicted of a felony offense. Based on my training and experience, I know that it is common for firearms traffickers and straw purchasers to have little or no criminal history.

FIREARM #2 RECOVERY

13. On December 20, 2023, at approximately 2218 hours, Kansas City, Missouri Police Department (KCMOPD) officers responded to the Fast Stop, located at 5020 Blue Ridge Cutoff, to investigate an armed business robbery. The victim told officers two black males entered the store, armed with a rifle and a handgun, and demanded cash and alcohol. A white Chevrolet Impala, bearing MO license plate EB1T1V, was identified as the suspect vehicle.

14. On January 31, 2024, at 1000 hours, a search warrant was executed at 1814 E 48th Street where the suspect vehicle was parked. Lamontre HILL and Robert HALBERT were arrested in relation to the robbery. A Pioneer Arms, Model HELLPUP, 7.62 x 39 caliber pistol, bearing serial number PAC1176250 (hereinafter **Firearm #2**); a Glock, Model 19, 9mm pistol; and a Glock, Model 17, 9mm pistol were recovered by law enforcement officials.

FIREARM #2 NIBIN

15. Firearms, when functioned, leave a unique "signature" or "impression" on expelled shell casings or projectiles (bullets). These impressions are now routinely being recorded, documented, and entered into a digitized database that can be used to help investigators track a specific firearm's route of travel, activity the firearm was involved in, and provide investigative leads that may assist in solving crimes. The database is referred to as National Integrated Ballistic Information Network (NIBIN). After the recovery of **Firearm #2**, it was test-fired. The shell

casings from the test fires were submitted for NIBIN analysis. The NIBIN comparative analysis showed two presumptive investigative leads. The casings showed a link from a test fired shell casing to a cartridge casing recovered by the Kansas City, Missouri Police Department in Case Number KC23038805. That case involved an aggravated assault that occurred on June 17, 2023. **Firearm #2** was also linked to Kansas City, Kansas Police Department (KCK) Case Number 2023-037770. That case involved an investigation of a shots fired call that occurred on April 19, 2023.

FIREARM #2 PURCHASE

16. After receiving trace report (T20240058594) for **Firearm #2**, I reviewed it and learned **F. MANNING** purchased it on July 23, 2022, from Small Arms Supply during a gun show in Independence, Missouri. The time that elapsed from when **Firearm #2** was purchased by **F. MANNING** and the first investigated shooting involving the same firearm was 557 days.

17. I obtained the 4473 Form from Small Arms Supply and it showed that **F. MANNING** purchased **Firearm #2** from Small Arms Supply on July 23, 2022. **F. MANNING** listed 4207 Windsor Avenue, Kansas City, Missouri 64123 as his address on the form. **F. MANNING** answered, “Yes” to Question 21a., affirming he was the actual transferee/buyer of **Firearm #2**. **F. MANNING** used his Missouri Driver’s License (DL #D203080015) to facilitate the transaction, which prompted a NICS check. The NICS check was conducted and generated a transaction number 102K87WGB resulting in a response of “Proceed.”

FIREARM #3 RECOVERY

18. On June 26, 2023, Columbia, Missouri Police Department recovered an Anderson Manufacturing, Model AM-15, multi-caliber pistol, bearing serial number 21404492 (hereinafter **Firearm #3**) in a wooded area near 3800 W. Gibbs Road., Columbia, Missouri. This case is a

homicide investigation, ATF agents have requested additional information from Columbia, Missouri Police Department.

FIREARM #3 PURCHASE

19. After receiving trace report (T20230368682) for **Firearm #3**, I reviewed it and learned **F. MANNING** purchased **Firearm #3** on May 26, 2022, from Alpha Pawn, located at 14501 E. US 40 Hwy, Kansas City, Missouri. The time that elapsed from when **Firearm #3** was purchased by **F. MANNING** to the suspected homicide was 396 days.

20. I obtained the 4473 Form from Alpha Pawn and it showed that **F. MANNING** purchased the receiver for **Firearm #3** and two additional Anderson Manufacturing, AM-15 receivers, one bearing serial number 21404462 (hereinafter **Firearm #9**, further details below under **Firearm #9**) and the other bearing serial number 21404472 (hereinafter **Firearm #10**, further details below under **Firearm #10**) from Alpha Pawn on May 26, 2022. **F. MANNING** listed 4207 Windsor Avenue, Kansas City, Missouri 64123, as his address of the form. **F. MANNING** answered, “Yes” to Question 21a., affirming he was the actual transferee/buyer of **Firearm #2**. **F. MANNING** used his Missouri Driver’s License (DL #D203080015) to facilitate the transaction, which prompted a NICS check. The NICS check was conducted and generated a transaction number 102HB3TJM resulting in a response of “Proceed.”

FIREARM #4 RECOVERY

21. On May 18, 2023, KCMOPD officers responded to an armed robbery. The victim stated he was approached by two unknown black males who pointed handguns at him and demanded his white 2014 Jeep Grand Cherokee. The next day, KCMOPD officers located the carjacked Jeep at 5245 Prospect Avenue and the driver, the sole occupant, of the stolen vehicle ran from officers. Shortly after fleeing the vehicle, the suspect, Derrick MILLER, was apprehended at

5326 Agnes Avenue, Kansas City, Missouri. During a search of the stolen vehicle, officers recovered **Firearm #4**.

22. On May 20, 2023, MILLER was charged with Robbery in the First Degree, Armed Criminal Action, Unlawful Possession of a Firearm, Tampering with a Motor Vehicle, and Resisting Arrest. MILLER's criminal history showed that on December 2, 2020, MILLER was charged with Robbery in the First Degree and on December 3, 2020, MILLER was charged with Robbery in the Second Degree. On January 5, 2023, MILLER was found guilty and sentenced to 279 days of shock time. In May 2022, MILLER was under indictment and would not have been able to legally purchase a firearm. After January 2023, MILLER was no longer under indictment, however he was on probation for the December 2020 robberies. MILLER has remained in Jackson County Jail since May 2023.

FIREARM #4 PURCHASE

23. After receiving trace report (T20230260231) for **Firearm #4**, I reviewed it and learned **F. MANNING** purchased **Firearm #4** on August 7, 2022, from Frontier Justice, located at 800 NE Jones Industrial Drive, Lee's Summit, Missouri 64064. The time that elapsed when **Firearm #4** was purchased by **F. MANNING** to the aforementioned robbery was 285 days. Based on my training and experience, I know this is a short time period and is indicative of straw purchasing and firearms trafficking activity.

24. I obtained the 4473 Form from Frontier Justice and it showed **F. MANNING** purchased the **Firearm #1** receiver and the **Firearm #4** receiver on August 7, 2022. **F. MANNING** used his Missouri Driver's License (DL #D203080015) to facilitate the transaction, which prompted a NICS check. The NICS check was conducted and generated a transaction number 102KRMDV3 resulting in a response of "Proceed." I also reviewed the answer

to Question 21a. on the 4473, which asked, “Are you the actual transferee/buyer of the firearm(s) listed on this form and any continuation sheet(s).” The answer to the question was a check mark in the “Yes” column. **F. MANNING** listed his address as 4207 Windsor Avenue, Kansas City, Missouri 64123.

FIREARM #5-11

25. Between May 2022 and April 2023, during the previously discussed ATF investigation, CI#1 purchased 27 firearms from defendants in the aforementioned Case Number 4:23-cr-00111-BP and other uncharged subjects. Seven of those firearms were originally purchased by **F. MANNING**. The firearms originally purchased by **F. MANNING** are as follows.

a. **Firearm #5:**

- i. **Firearm #5 Recovery:** On April 6, 2023, CI#1 purchased an Anderson Manufacturing, Model AM-15, 5.56, bearing serial number 22108192 (hereinafter **Firearm #5**) from Sheron MANNING.
- ii. **Firearm #5 Purchase:** After receiving trace report (T20230176520) for **Firearm #5**, I reviewed it and learned **F. MANNING** purchased **Firearm #5** on January 13, 2023, from Alpha Pawn, located at 14501 E US 40 Hwy, Kansas City, Missouri. The time that elapsed from when **Firearm #5** was purchased by **F. MANNING** to when CI#1 purchased the firearm was 83 days. Based on my training and experience, I know this is a very short time period and is indicative of straw purchasing and firearms trafficking activity.

iii. I obtained the 4473 Form obtained from Alpha Pawn and it shows **F. MANNING** purchased the **Firearm #5** receiver and another Anderson Manufacturing, Model AM-15 receiver, bearing serial number 22108194 (hereinafter **Firearm #16**, not yet recovered) receiver that was purchased on August 7, 2022. **F. MANNING** used his Missouri Driver's License (DL #D203080015) to facilitate the transaction, which prompted a NICS check. The NICS check was conducted and generated a transaction number 102S9MTVL resulting in a response of "Proceed." I also reviewed the answer to Question 21a. on the 4473, which asked, "Are you the actual transferee/buyer of the firearm(s) listed on this form and any continuation sheet(s)." The answer to the question was a check mark in the "Yes" column. **F. MANNING** listed his address as 4207 Windsor Avenue, Kansas City, Missouri 64123.

b. **Firearm #6:**

- i. **Firearm #6 Recovery:** On August 11, 2022, CI #1 purchased an Anderson Manufacturing, Model AM-15, Multi caliber, bearing serial number 22022225 (hereinafter **Firearm #6**) from Antonio MANNING (a defendant in Case No. 4:23-cr-00111-BP).
- ii. **Firearm #6 Purchase:** After receiving trace report (T20220400441) for **Firearm #6**, I reviewed it and learned **F. MANNING** purchased **Firearm #6** on July 19, 2022, from Frontier Justice, located at 800 NE Jones Industrial Drive, Lee's

Summit, Missouri 64064. The time that elapsed from when **Firearm #6** was purchased by **F. MANNING** to when it was sold to CI#1 was 23 days. Based on my training and experience, I know this is an extremely short time period and is indicative of straw purchasing and firearms trafficking activity.

- iii. I obtained the 4473 Form from Frontier Justice. It shows **F. MANNING** purchased the **Firearm #6** receiver and three other Anderson Manufacturing, Model AM-15 receivers. One bears serial number 22022793 (hereinafter **Firearm #28**, not yet recovered); one bears serial number 22022785 (hereinafter **Firearm #29**, not yet recovered); and one bears serial number 22022776 (hereinafter **Firearm #30**). These firearms were purchased on July 19, 2022. **F. MANNING** used his Missouri Driver's License (DL #D203080015) to facilitate the transaction, which prompted a NICS check. The NICS check was conducted and generated a transaction number 102259MTVL resulting in a response of "Proceed." I also reviewed the answer to Question 21a. on the 4473, which asked, "Are you the actual transferee/buyer of the firearm(s) listed on this form and any continuation sheet(s)." The answer to the question was a check mark in the "Yes" column. **F. MANNING** listed his address as 4207 Windsor Avenue, Kansas City, Missouri 64123.

c. **Firearms #7-9:**

- i. **Firearm #7-9 Recovery:** On June 14, 2022, CI#1 purchased three firearms from Demon MONDAINE and Antonio MANNING. The firearms were: a Glock, Model 48, 9mm, bearing serial number BWMK796 (**Firearm #7**); an Anderson Manufacturing, Model AM-15, Multi caliber, bearing serial number 22023357 (**Firearm #8**); and an Anderson Manufacturing, Model AM-15, Multi caliber, bearing serial number 21404462 (**Firearm #9**).
- ii. **Firearm #7 and Firearm #8 Purchase:** After receiving trace report (T20220294267 and T20220294266) for **Firearm #7** and **#8** respectively, I reviewed them and learned **F. MANNING** purchased **Firearm #7** and **Firearm #8** on May 22, 2022, from Frontier Justice, located at 800 NE Jones Industrial Drive, Lee's Summit, Missouri 64064. The time that elapsed when **Firearm #7** and **Firearm #8** were purchased by **F. MANNING** to when CI#1 purchased them was 23 days. Based on my training and experience, I know this is an extremely short time period and is indicative of straw purchasing and firearms trafficking activity.
- iii. I obtained a 4473 form from Frontier Justice. It shows **F. MANNING** purchased the **Firearm #7** receiver and the **Firearm #8** receiver on May 22, 2022. **F. MANNING** used his Missouri Driver's License (DL #D203080015) to facilitate the transaction, which prompted a NICS check. The NICS check was conducted and

generated a transaction number 102H6HWV6 resulting in a response of “Proceed.” I also reviewed the answer to Question 21a. on the 4473, which asked, “Are you the actual transferee/buyer of the firearm(s) listed on this form and any continuation sheet(s).” The answer to the question was a check mark in the “Yes” column. **F. MANNING** listed his address as 4207 Windsor Avenue, Kansas City, Missouri 64123.

- iv. **Firearm #9 Purchase:** After receiving trace report (T20220294265) for **Firearm #9**, I reviewed it and learned **F. MANNING** purchased **Firearm #9** on May 26, 2022, from Alpha Pawn, located at 14501 E US 40 Hwy, Kansas City, Missouri 64136. The time that elapsed when **Firearm #9** was purchased by **F. MANNING** to when CI#1 purchased the firearm was 23 days. Based on my training and experience, I know this is an extremely short time to crime period and is indicative of straw purchasing and firearms trafficking activity.
- v. As stated under the purchase of **Firearm #3**, I obtained the 4473 form from Alpha Pawn and it showed that **F. MANNING** purchased the receiver for **Firearm #3**, the receiver for **Firearm #9** and the receiver for **Firearm #10** (further details below under **Firearm #10**) from Alpha Pawn on May 26, 2022. **F. MANNING** listed 4207 Windsor Avenue, Kansas City, Missouri 64123, as his address of the form. **F. MANNING** answered, “Yes” to Question 21a., affirming

he was the actual transferee/buyer of **Firearm #9**. **F. MANNING** used his Missouri Driver's License (DL #D203080015) to facilitate the transaction, which prompted a NICS check. The NICS check was conducted and generated a transaction number 102HB3TJM resulting in a response of "Proceed."

d. **Firearm #10:**

- i. **Firearm #10 Recovery:** On June 3, 2022, CI#1 purchased an Anderson Manufacturing, Model AM-15, 5.56 caliber, S/N 21404472 (**Firearm #10**) from Demon MONDAINE.
- ii. **Firearm #10 Purchase:** After receiving trace report (T20220277723) for **Firearm #10**, I reviewed it and learned **F. MANNING** purchased **Firearm #10** on May 26, 2022, from Alpha Pawn, located at 14501 E US 40 Hwy, Kansas City, Missouri 64136. The time from when **Firearm #10** was purchased by **F. MANNING**, to the controlled buy with CI#1, was eight days. Based on my training and experience, I know this is an extremely short time to crime period and is indicative of straw purchasing and firearms trafficking activity.
- iii. As stated under the purchase of **Firearm #3** and **Firearm #9**, the 4473 form from Alpha Pawn showed that **F. MANNING** purchased the receiver for **Firearm #3**, the receiver for **Firearm #9** and the receiver for **Firearm #10** from Alpha Pawn on May 26, 2022. **F. MANNING** listed 4207 Windsor Avenue, Kansas City, Missouri

64123, as his address of the form. **F. MANNING** answered, “Yes” to Question 21a., affirming he was the actual transferee/buyer of **Firearm #10**. **F. MANNING** used his Missouri Driver’s License (DL #D203080015) to facilitate the transaction, which prompted a NICS check. The NICS check was conducted and generated a transaction number 102HB3TJM resulting in a response of “Proceed.”

e. **Firearm #11:**

- i. **Firearm #11 Recovery:** On May 25, 2022, CI#1 purchased an Anderson Manufacturing, Model AM-15, 5.56 caliber, S/N 22023366 (**Firearm #11**) from Demon MONDAINE.
- ii. **Firearm #11 Purchase:** After receiving trace report (T20220259238) for **Firearm #11**, I reviewed it and learned **F. MANNING** purchased **Firearm #11** on May 11, 2022, from Frontier Justice, located at 800 NE Jones Industrial Drive, Lee’s Summit, Missouri 64064. The time that elapsed from when **Firearm #11** was purchased by **F. MANNING** to when it was sold to CI#1, was 14 days. Based on my training and experience, I know this is an extremely short time period and is indicative of straw purchasing and firearms trafficking activity.
- iii. I obtained a 4473 form from Frontier Justice. It shows **F. MANNING** purchased the **Firearm #11** receiver and two other Anderson Manufacturing, Model AM-15 receivers, bearing serial

number 22023369 (hereinafter **Firearm #40**, not yet recovered) and a receiver, bearing serial number 22023385 (hereinafter **Firearm #41**, not yet recovered) on May 11, 2022. **F. MANNING** used his Missouri Driver's License (DL #D203080015) to facilitate the transaction, which prompted a NICS check. The NICS check was conducted and generated a transaction number 102GW404Z resulting in a response of "Proceed." I also reviewed the answer to Question 21a. on the 4473, which asked, "Are you the actual transferee/buyer of the firearm(s) listed on this form and any continuation sheet(s)." The answer to the question was a check mark in the "Yes" column. **F. MANNING** listed his address as 4207 Windsor Avenue, Kansas City, Missouri 64123.

FIREARM #12 RECOVERY

26. On March 3, 2023, Kansas City, Kansas Police Department (KCK) officers recovered an Anderson Manufacturing, Model AM-15, .223 caliber pistol, bearing serial number 22023353 (hereinafter **Firearm #12**) a subject known to law enforcement officials. Details for this incident have been requested from KCK. The subject's criminal history search showed an alert for "Criminal Gang Member" and identified the subject as a member of "WESTSIDE 18TH STREET MALANDROS (18TH STREET) GANG MEMBER." This subject has no other entries in his criminal history.

FIREARM #12 PURCHASE

27. After receiving trace report (T20230150951) for **Firearm #12**, I reviewed it and learned **F. MANNING** purchased **Firearm #12** on May 21, 2022, from Frontier Justice located at 800 NE Jones Industrial Drive, Lee's Summit, Missouri 64064. The time that elapsed from when **Firearm #12** was purchased by **F. MANNING** to when it was recovered in ARREALA's possession was 286 days. Based on my training and experience, I know this is a relatively short period of time from purchase to law enforcement recovery and is indicative of straw purchasing and firearms trafficking activity.

28. I obtained 4473 Forms from Frontier Justice and they showed that **F. MANNING** purchased the receiver for **Firearm #12** and one additional Anderson Manufacturing, AM-15 receiver, bearing serial number 22023396 (hereinafter **Firearm #39**, not yet recovered) from Frontier Justice on May 21, 2022. **F. MANNING** listed 4207 Windsor Avenue, Kansas City, Missouri 64123, as his address of the form. **F. MANNING** answered, "Yes" to Question 21a., affirming he was the actual transferee/buyer of **Firearm #12**. **F. MANNING** used his Missouri Driver's License (DL #D203080015) to facilitate the transaction, which prompted a NICS check. The NICS check was conducted and generated a transaction number 102H5RWB7 resulting in a response of "Proceed."

FIREARM #13 RECOVERY

29. On January 25, 2023, KCMOPD officers responded to 3923 Forest Avenue, Kansas City, Missouri, to an armed party call. A known minor, who was 17 at the time and unable to legally possess a firearm, was taken into custody. The homeowner gave officers permission to search the residence for the firearm and officers recovered an Anderson Manufacturing, Model AM-15, multi-caliber pistol, bearing serial number 22031006 (hereinafter **Firearm #13**) from the

attic, where the minor was hiding before the minor was arrested. The minor was arrested for Tampering with a Motor Vehicle, since the vehicle he drove to the residence was reported as stolen from Gladstone, Missouri. The minor later became the victim of a homicide on November 13, 2023.

FIREARM #13 PURCHASE

30. After receiving trace report (T20230264580) for **Firearm #13**, I reviewed it and learned **F. MANNING** purchased **Firearm #13** on July 23, 2022, from Black Lantern Outdoors during a gun show in Independence, Missouri. Based on the date of the purchase, I believe this was the same gun show where **F. MANNING** purchased **Firearm #2**. The time that elapsed from when **Firearm #13** was purchased by **F. MANNING** to when it was recovered in the minor's possession was 186 days. Based on my training and experience, I know this is a short time lapse is indicative of straw purchasing and firearms trafficking activity. Based on my training and experience, I know juveniles will ask other young adults to straw purchase firearms for them since they are unable to legally purchase firearms from FFLs them themselves.

31. The 4473 form from Black Lantern Outdoors showed that **F. MANNING** purchased the receiver for **Firearm #13**, two other Anderson Manufacturing, Model AM-15 receivers, one bearing serial number 22031021 (hereinafter **Firearm #22**, which has not been recovered yet) and one bearing serial number 22031010 (hereinafter **Firearm #23**, which has not been recovered yet), and a Glock, Model 19X, 9mm pistol, bearing serial number BWZS217 (hereinafter **Firearm #24**, which has not been recovered yet) from Black Lantern Outdoors on July 23, 2022. **F. MANNING** listed 4207 Windsor Avenue, Kansas City, Missouri 64123 as his address of the form. **F. MANNING** answered, "Yes" to Question 21a., affirming he was the actual transferee/buyer of **Firearm #13**. **F. MANNING** used his Missouri Driver's License (DL

#D203080015) to facilitate the transaction, which prompted a NICS check. The NICS check was conducted and generated a transaction number 102K89329 resulting in a response of “Proceed.”

FIREARM #14 RECOVERY

32. On October 10, 2022, KCMOPD officers responded to a residence located at 3411 Morrell Avenue, Kansas City, Missouri, to investigate a reported disturbance. Officers observed **F. MANNING** on top of a vehicle and took him into custody. The calling party stated **F. MANNING** had been suspended from school and returned home with a bag that she later overheard him telling someone that he had a firearm. The calling party searched **F. MANNING**’s room and located a Glock, Model 21, .45 caliber pistol, bearing serial number AGWH381 (hereinafter **Firearm #14**). Based on the calling party referring to **F. MANNING** returning home and searching **F. MANNING**’s room, I believe this may be where **F. MANNING** was living at that time.

FIREARM #14 PURCHASE

33. After receiving a trace report (T20220501215) for **Firearm #14**, I reviewed it and learned **F. MANNING** purchased **Firearm #14** on September 20, 2022, from Frontier Justice located at 800 NE Jones Industrial Drive, Lee’s Summit, Missouri 64064. The time that elapsed from when **Firearm #14** was purchased by **F. MANNING** to when it was recovered was 18 days.

34. I obtained the 4473 Form from Frontier Justice that showed that **F. MANNING** purchased the receiver for **Firearm #14** from Frontier Justice on September 20, 2022. **F. MANNING** listed 4207 Windsor Avenue, Kansas City, Missouri 64123, as his address on the form. **F. MANNING** answered, “Yes” to Question 21a., affirming he was the actual transferee/buyer of **Firearm #14**. **F. MANNING** used his Missouri Driver’s License (DL

#D203080015) to facilitate the transaction, which prompted a NICS check. The NICS check was conducted and generated a transaction number 102M77ZMZ resulting in a response of “Proceed.”

FIREARM #15 RECOVERY

35. On August 27, 2022, KCMOPD officers responded to an injury accident. Upon arrival, the driver, Walter SANDERS, was in the vehicle and unable to give a statement. During an inventory of the vehicle prior to towing it, an Anderson Manufacturing, Model AM-15, 300 caliber rifle, bearing serial number 22022238 (hereinafter **Firearm #15**) was recovered. SANDERS’s criminal history shows that in October 2019, SANDERS was arrested for assault. In October 2021, SANDERS received a Suspended Imposition of Sentence (SIS) for unlawful use of a weapon.

FIREARM #15 PURCHASE

36. After receiving trace report (T20220426939) for **Firearm #15**, I reviewed it and learned **F. MANNING** purchased **Firearm #15** on July 1, 2022, from Frontier Justice located at 800 NE Jones Industrial Drive, Lee’s Summit, Missouri 64064. The time that elapsed from when **Firearm #15** was purchased by **F. MANNING** to when it was recovered in SANDERS’s possession was 57 days. Based on my training and experience, I know this is a very short time period and is indicative of straw purchasing and firearms trafficking activity

37. The 4473 from Frontier Justice showed that **F. MANNING** purchased the receiver for **Firearm #15** and two additional Anderson Manufacturing, AM-15 receivers, bearing serial number 22022230 (hereinafter **Firearm #32**, not yet recovered) and one bearing serial number 22022219 (hereinafter **Firearm #33**, not yet recovered) from Frontier Justice on July 1, 2022. **F. MANNING** listed 4207 Windsor Avenue, Kansas City, Missouri 64123, as his address of the form. **F. MANNING** answered, “Yes” to Question 21a., affirming he was the actual

transferee/buyer of **Firearm #15**. **F. MANNING** used his Missouri Driver's License (DL #D203080015) to facilitate the transaction, which prompted a NICS check. The NICS check was conducted and generated a transaction number 102JK6R1Z resulting in a response of "Proceed."

F. MANNING FIREARMS PURCHASED BY DATE

38. Based on my involvement in this investigation, I am aware of the following firearms **F. MANNING** purchased or attempted to purchase, as of the date of this Affidavit:

a. **January 13, 2023:**

- i. Location: Alpha Pawn, 14501 E. US 40 Hwy, Kansas City, Missouri 64136.
- ii. Firearms:
 - Anderson Manufacturing receiver, Model AM-15, bearing serial number 22108192 (**Firearm #5**);
 - Anderson Manufacturing receiver, model AM-15, bearing serial number 22108194 (**Firearm #16**, not recovered).

b. **November 26, 2022:**

- i. Location: Fort Barnes Military Supply at a gun show in Kansas City, Missouri.
- ii. Firearms **F. MANNING** attempted to purchase, but was not approved:
 - Anderson Manufacturing, Model AM-15, bearing serial number 20220916 (**Firearm #17**, not purchased);
 - Anderson Manufacturing, Model AM-15, bearing serial number 20220940 (**Firearm #18**, not purchased).
- iii. Note: I spoke with an employee of Fort Barnes Military Supply, who stated **F. MANNING** received a delay on the firearms. **F. MANNING** told the employee he did not want to wait and come back the next day, so he chose to cancel the transaction.

c. **October 22, 2022:**

- i. Location: Frontier Justice, 800 NE Jones Industrial Drive, Lee's Summit, Missouri 64064.
 - Anderson Manufacturing, model AM-15, bearing serial number 22025205 (**Firearm #19**, not recovered);
 - Anderson Manufacturing, model AM-15, bearing serial number 22025206 (**Firearm #20**, not recovered).

d. **September 22, 2022:**

- i. Location: Frontier Justice, 800 NE Jones Industrial Drive, Lee's Summit, Missouri 64064.
- ii. Firearm:
 - Glock, Model 21 .45 caliber pistol, bearing serial number AGWH381 (**Firearm #14**).

e. **August 22, 2022:**

- i. Location: Alpha Pawn, 14501 E US 40 Hwy, Kansas City, Missouri 64136.
- ii. Firearm:
 - Anderson Manufacturing, model AM-15, bearing serial number 21404474 (**Firearm #21**, not recovered).

f. **August 7, 2022:**

- i. Location: Alpha Pawn, 14501 E US 40 Hwy, Kansas City, Missouri 64136.
- ii. Firearms:
 - Anderson Manufacturing, model AM-15 bearing serial number 22022228 (**Firearm #1**);
 - Anderson Manufacturing, model AM-15, bearing serial number 22022235 (**Firearm #4**).

g. **July 24, 2022:**

- i. Location: Saint Louis Tactical, LLC., at a gun show in Independence, Missouri.
- ii. Firearms:
 - Anderson Manufacturing, Model AM-15, bearing serial number 22015919 (**Firearm #42**)

h. **July 23, 2022:**

- i. Location: Small Arms Supply, at a gun show in Independence, MO.
- ii. Firearm:
 - Pioneer, model HELLPUP, bearing serial number PAC1176250 (**Firearm #2**).
- iii. Location: Black Lantern Outdoors, at a gun show in Independence, Missouri.
- iv. Firearms:
 - Anderson Manufacturing, Model AM-15, bearing serial number 22031006 (**Firearm #13**);
 - Anderson Manufacturing, Model AM-15, bearing serial number 22031021 (**Firearm #22**, not recovered);
 - Anderson Manufacturing, Model AM-15, bearing serial number 22031010 (**Firearm #23**, not recovered);
 - Glock, Model 19x, bearing serial number BWZS217 (**Firearm #24**, not recovered).

i. **July 22, 2022:**

- i. Location: Alpha Pawn, 14501 E. US 40 Hwy, Kansas City, Missouri 64136.
- ii. Firearms:
 - Anderson Manufacturing, Model AM-15, bearing serial number 21404464 (**Firearm # 25**, not recovered);

- Glock, model 30, .45 caliber pistol, bearing serial number BVVR048 (**Firearm #26**, not recovered).
 - iii. Location: CR Sales Firearms, 1703 S Noland Road, Independence, Missouri 64055.
 - iv. Firearm:
 - Glock, model 22, .40 caliber pistol, bearing serial number BUWG486 (**Firearm #27**, not recovered).
 - v. Based on my training and experience, I know purchasing two handguns at the same time from the same store would generate a multiple sale³, thus purchasing the two Glock handguns from two different stores, **F. MANNING** was able to circumvent the multiple sale.
- j. **July 19, 2022:**
- i. Location: Frontier Justice, 800 NE Jones Industrial Drive, Lee's Summit, MO 64064.
 - ii. Firearms:
 - Anderson Manufacturing, Model AM-15, SN: 22022225 (**Firearm #6**);
 - Anderson Manufacturing, Model AM-15, SN: 22022793 (**Firearm #28**);
 - Anderson Manufacturing, Model AM-15, SN: 22022785 (**Firearm #29**);

³The Gun Control Act (GCA) of 1968 requires federal firearms licensees (FFLs) to send a report, by filling out three copies of the ATF Form 3310.4, Report of Multiple Sale or Other Disposition of Pistols and Revolvers, when there is a sale of two or more handguns if they occur at the same time or within five consecutive business days of each other. Once copy is sent the ATF National Tracing Center, one copy is sent to the Chief Local Law Enforcement Official, and one form is attached to the ATF Form 4473. ATF uses the information gathered from multiple sales transactions to investigate possible firearms trafficking cases. If one or more firearms recovered from a crime are part of a multiple purchase, this could be an indicator of potential firearms trafficking. Crime guns recovered shortly after a multiple sale is known as a short time-to-crime ratio.

- Anderson Manufacturing, Model AM-15, SN: 22022776 (**Firearm #30**).

iii. Location: 23rd Street Pawn, 2230 S Norton Avenue, Independence, Missouri 64052.

iv. Firearms:

- American Tactical, Omni-Hybrid, .556 caliber pistol, SN: NS111029 (**Firearm #31**, not recovered).

k. **July 1, 2022:**

i. Location: Frontier Justice, 800 NE Jones Industrial Dr, Lees Summit, MO 64064.

ii. Firearms:

- Anderson Manufacturing, model AM-15, SN: 22022238 (**Firearm #15**);
- Anderson Manufacturing, model AM-15, SN: 22022230 (**Firearm #32**, not recovered);
- Anderson Manufacturing, model AM-15, SN: 22022219 (**Firearm #33**, not recovered).

l. **June 18, 2022:**

i. Location: Frontier Justice, 800 NE Jones Industrial Drive, Lee's Summit, MO 64064.

ii. Firearms:

- Anderson Manufacturing, Model AM-15, SN: 22022792 (**Firearm #34**, not recovered);
- Anderson Manufacturing, Model AM-15, SN: 22022446 (**Firearm #35**, not recovered).

m. **June 15, 2022:**

i. Location: Frontier Justice, 800 NE Jones Industrial Drive, Lee's Summit, Missouri 64064.

ii. Firearms:

- Anderson Manufacturing, model AM-15, SN: 22022401 (**Firearm #36**, not recovered);
- Anderson Manufacturing, model AM-15, SN: 22023382 (**Firearm #37**, not recovered);
- Anderson Manufacturing, model AM-15, SN: 22022407 (**Firearm #38**, not recovered).

n. **May 26, 2022:**

i. Location: Alpha Pawn, 14501 E US 40 Hwy, Kansas City, Missouri 64136.

ii. Firearms:

- Anderson Manufacturing, Model AM-15, SN: 21404492 (**Firearm #3**);
- Anderson Manufacturing, Model AM-15, SN: 21404462 (**Firearm #9**);
- Anderson Manufacturing, Model AM-15, SN: 21404472 (**Firearm #10**).

o. **May 22, 2022:**

i. Location: Frontier Justice, 800 NE Jones Industrial Drive, Lee's Summit, Missouri 64064.

ii. Firearms:

- Anderson Manufacturing, Model AM-15, SN: 22023357 (**Firearm #8**);
- Glock, Model 48, 9mm pistol, SN: BWMK796 (**Firearm #7**).

p. **May 21, 2022:**

i. Location: Frontier Justice, 800 NE Jones Industrial Drive, Lee's Summit, Missouri 64064.

ii. Firearms:

- Anderson Manufacturing, model AM-15, SN: 22023353 (**Firearm #12**);
- Anderson Manufacturing, model AM-15, SN: 22023396 (**Firearm #39**, not recovered).

q. **May 11, 2022:**

i. Location: Frontier Justice, 800 NE Jones Industrial Drive, Lee's Summit, Missouri 64064.

ii. Firearms:

- Anderson Manufacturing, model AM-15, SN: 22023366 (**Firearm #11**);
- Anderson Manufacturing, model AM-15, SN: 22023369 (**Firearm #40**, not recovered);
- Anderson Manufacturing, model AM-15, SN: 22023385 (**Firearm #41**, not recovered).

ADDITIONAL INFORMATION

39. On February 27, 2024, ATF Intelligence Research Specialist Steve Meintz conducted a query of **F. MANNING** through the ATF Federal Licensing System. The query showed that **F. MANNING** does not possess any ATF Licenses to engage in the business of selling firearms. In other words, **F. MANNING** is not an FFL and, accordingly, he cannot legally engage in a firearms trafficking business for profit.

40. Based on my training and experience, I also believe that **F. MANNING's** firearm purchases are indicative of straw purchasing and firearms trafficking activity. Specifically, the repetitive nature of **F. MANNING's** purchases is indicative of straw purchasing and firearms trafficking. I have discovered that **F. MANNING** has purchased at least 33 Anderson Manufacturing, AM-15 receivers in nine months. Many of those Anderson Manufacturing

receivers were purchased at the same time. Further, I know that fifteen of the firearms purchased by **F. MANNING** were recovered by law enforcement officials in the possession of individuals other than **F. MANNING**. I also know that several individuals who possessed these firearms possessed by **F. MANNING** were legally prohibited from knowingly possessing firearms. All of these factors, combined with my training and experience, lead me to believe **F. MANNING** is involved in the straw purchasing firearms for prohibited persons and illegal firearms trafficking without a license.

41. Counts Three through Twelve of the Complaint refer to specific firearms that were purchased by **F. MANNING** from FFLs. In each of these sales, **F. MANNING** represented that he was the actual buyer of the firearm, but in fact these firearms were transferred to other persons shortly after **F. MANNING** purchased them as evinced by the fact that law enforcement officials recovered them from other persons. Below is a table describing each firearm that also refers to the firearm number that is identified for each firearm in this Affidavit.

<u>Count</u>	<u>Date</u>	<u>Dealer</u>	<u>Firearms</u>	<u>Firearm #</u>
3	5/11/2022	Frontier Justice, Lee's Summit, Missouri	Anderson Manufacturing, Model AM-15 receiver, Multi caliber, bearing serial number 22023366	Firearm #11
4	5/21/2022	Frontier Justice, Lee's Summit, Missouri	Anderson Manufacturing, Model AM-15 receiver, .223 caliber pistol, bearing serial number 22023353	Firearm #12

5	5/22/2022	Frontier Justice, Lee's Summit, Missouri	Glock, Model 48, 9mm pistol, bearing serial number BWMK796	Firearm #7
6	5/22/2022	Frontier Justice, Lee's Summit, Missouri	Anderson Manufacturing, Model AM-15 receiver, Multi caliber, bearing serial number 22023357	Firearm #8
7	5/26/2022	Alpha Pawn, Kansas City, Missouri	Anderson Manufacturing, AM-15 receiver, bearing serial number 21404462	Firearm #9
8	5/26/2022	Alpha Pawn, Kansas City, Missouri	Anderson Manufacturing, AM-15 receiver, bearing serial number 21404472	Firearm #10
9	7/19/2022	Frontier Justice, Lee's Summit, Missouri	Anderson Manufacturing, Model AM-15 receiver, Multi caliber, bearing serial number 22022225	Firearm #6
10	8/7/2022	Frontier Justice, Lee's Summit, Missouri	Anderson Manufacturing, Model AM-15 receiver, bearing serial number 22022235	Firearm #4
11	8/7/2022	Frontier Justice, Lee's Summit, Missouri	Anderson Manufacturing, Model AM-15 receiver, .223 caliber pistol, bearing serial number 22022228	Firearm #1
12	1/13/2023	Alpha Pawn, Kansas City, Missouri	Anderson Manufacturing, Model AM-15 receiver, 5.56 caliber, bearing serial number 22108192	Firearm #5

CONCLUSION

42. Based on the facts set forth in this affidavit, I believe there is probable cause to believe that **F. MANNING** has committed several federal offenses. Those offenses include the following violations: Title 18, United States Code, Sections 922(a)(6) (false statements intended or likely to deceive a firearms dealer), 924(a)(1)(A); (false statements during purchases of a firearms), Title 18, United States Code, Section 933(a)(1), (3), and (b) (trafficking conspiracy to traffic firearms); and Title 18, United States Code, Sections 922(a)(1)(A), 923(a) and 924(a)(1)(D) (engaging in firearm sales without a license).

Further Affiant sayeth naught.

Steven Lester Digitally signed by Steven Lester
Date: 2024.03.11 14:09:16 -05'

STEVEN LESTER
Special Agent
Bureau of Alcohol, Tobacco, Firearms and Explosives

Subscribed and sworn to before me

this 11th day of March 2024. Sworn to by telephone
4:35 PM, Mar 11, 2024

Lajuana M. Counts

HONORABLE LAJUANA M. COUNTS
United States Magistrate Judge
Western District of Missouri

